

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

KALIEF WILLIAMS,

Plaintiff,

v.

THE RUSSO'S PAYROLL GROUP, INC. D/B/A
RUSSO'S ON THE BAY, ROBERT "ROBBIE"
RUSSO, AND GIUSEPPE "JOE" VACCA,

Defendants.

21-CV-02922
(EK)(CLP)

**JOINT CIVIL CASE
MANAGEMENT PLAN AND
DISCOVERY SCHEDULE**

JOINT CIVIL CASE MANAGEMENT PLAN DISCOVERY SCHEDULE

Pursuant to Rule 26(f)(3) of the Federal Rules of Civil Procedure, the parties in the above-captioned matter have met and conferred about a proposed discovery plan and consent to the following joint civil case management plan and discovery schedule.

The parties exchanged mandatory disclosures on August 12, 2022, and will serve written discovery requests and interrogatories by July 7, 2023 and their responses will be due on August 7, 2023.

The parties will appear before Judge Pollak for a status conference on September 28, 2023 at 10:15 AM.

Depositions are to proceed and be completed by November 31, 2023.

All fact discovery will be completed by January 31, 2024.

Notice of the identity of any expert will be provided on January 31, 2024.

Expert Reports are due on March 1, 2024 and any Rebuttal Reports are due April 1, 2024.

Expert depositions are to be completed by April 30, 2024.

Letter Motion to request pre-motion conference to move for Summary Judgment must be filed by May 1, 2024.

STOLL, GLICKMAN & BELLINA, LLP

MILMAN LABUDA LAW GROUP,
PLLC

By: _____/s/_____

By: _____/s/_____

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